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March 31, 2015

VIA ECF

Hon. A. Kathleen Tomlinson, U.S.M.J. United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

Re: Ramos v. Gutman, Mintz, Baker & Sonnenfeldt, et al. 14-cv-04643 (LDW) (AKT)

Your Honor:

This firm represents Gutman, Mintz, Baker & Sonnenfeldt P.C., and Eric Justin Keilbach, (collectively "Defendants") in the above referenced matter.

Pursuant to Your Honor's Case Management and Scheduling Order, the parties jointly submit this letter to advise the Court as to the status of discovery. As of now, discovery is proceeding on schedule and there are no pending disputes requiring Court intervention. Both parties are conducting good faith searches for all responsive documents, and we anticipate that supplemental responses to document demands will be served by both parties. That being said, Plaintiff and Defendants reserve the right to re-evaluate the existence of any pending discovery disputes upon receipt of supplemental responses.

Accordingly, the parties respectfully request that the telephone conference scheduled before this Honorable Court on April 6, 2015, be cancelled.



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Respectfully submitted,

The Law Offices of Shimshon Wexler

Rivkin Radler, LLP

/s/

/s/

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